

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

MATTHEW GERSHKOFF, :

Defendant :

No. 3:20-CR-82

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

Wire Fraud Conspiracy

18 U.S.C. § 1349

I. Background

At times material to the Information:

1. Corporation #1 was an automobile warranty company located in Wilkes-Barre, Pennsylvania, within the Middle District of Pennsylvania. Corporation #1 and its authorized dealers sold, among other things, warranty insurance policies for used automobiles.

2. Co-conspirator #1 ("CC-1") was a claims adjuster and claims manager for Corporation #1. CC-1's responsibilities included

FILED
SCRANTON
MAR 06 2020
PER *AG*
DEPUTY CLERK

reviewing and approving claims submitted on warranty insurance policies issued by Corporation #1.

3. A Plus Collision Center LLC (“A Plus”) was a business located in Providence, Rhode Island. A Plus provided, among other things, collision repair services for damaged automobiles.

4. Co-conspirator #2 (“CC-2”) was the owner and operator of A Plus.

5. Village Motors (“Village”) was a business located in Providence, Rhode Island. Village provided, among other things, repair services for damaged automobiles.

6. Platinum Auto Services (“Platinum”) was a business located in Providence, Rhode Island. Platinum provided, among other things, automobile detailing services.

7. Ultra Auto Center (“Ultra”) was a business located in North Attleboro, Massachusetts. Ultra provided, among other things, automobile sales and repair services for damaged automobiles.

8. Co-conspirator #3 (“CC-3”) was an employee at Village, the owner and operator of Platinum, and an employee at Ultra.

9. The defendant, MATTHEW GERSHKOFF, was an employee and service manager at Village, a claims appraiser for A Plus, and an employee of various automobile dealerships.

10. The warranty insurance policies sold by Corporation #1 permitted policyholders to obtain automobile repairs at automobile repair businesses across the nation, including A Plus, Village, Platinum, and Ultra. Upon receiving and approving claims for automobile repair services covered by Corporation #1's warranty insurance policies, Corporation #1 paid the automobile repair business directly, by way of a credit card account maintained by Corporation #1 at a financial institution.

II. Statutory Allegation

11. From on or about January 8, 2014 through on or about October 2, 2018, in Luzerne County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

MATTHEW GERSHKOFF,

knowingly and unlawfully combined, conspired, confederated and agreed with other persons known and unknown to the United States

Attorney, to knowingly devise, and intend to devise, a scheme and artifice to defraud Corporation #1, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, and attempting to do so, transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

III. Manner and Means

The conspiracy was accomplished, in part, by the following manner and means:

12. MATTHEW GERSHKOFF and his coconspirators prepared and caused to be prepared invoices that stated falsely that A Plus, Village, Platinum, and Ultra would perform certain automobile repair services listed in the invoices, for policyholders of Corporation #1.

13. MATTHEW GERSHKOFF and his coconspirators prepared and caused to be prepared verification forms that stated falsely that A Plus, Village, Platinum, and Ultra had completed the automobile repair

services listed in the invoices, for policyholders of Corporation #1, when in fact no policyholders of Corporation #1 had requested repair services from A Plus, Village, Platinum, and Ultra, and no repair services were in fact performed.

14. MATTHEW GERSHKOFF and his coconspirators, knowing that the invoices and verification forms contained false representations, sent and caused to be sent the invoices and verification forms to Corporation #1 by facsimile, across state lines from Rhode Island to Pennsylvania, and from Massachusetts to Pennsylvania, to seek payment of the invoices pursuant to warranty insurance policies issued by Corporation #1. The invoices and verification forms bore the forged signatures of the policyholders of the warranty insurance policies issued by Corporation #1.

15. CC-1 approved payment of the forged and fraudulent invoices pursuant to warranty insurance policies issued by Corporation #1, knowing that the policyholders of Corporation #1 had not requested repair services from A Plus, Village, Platinum and Ultra, knowing that no repair services were in fact performed by A Plus, Village, Platinum

and Ultra, and knowing that the invoices and verification forms faxed to Corporation #1 from A Plus, Village, Platinum and Ultra contained false representations and forged signatures.

16. MATTHEW GERSHKOFF and his coconspirators caused Corporation #1 to pay the false invoices by wires from the credit card account maintained by Corporation #1 at a financial institution, to accounts maintained by A Plus, Village, Platinum and Ultra at financial institutions.

17. Coconspirators of MATTHEW GERSHKOFF withdrew, in cash, funds paid by Corporation #1 to A Plus, Village, Platinum and Ultra, in satisfaction of the false invoices. The proceeds of the scheme to defraud were divided between MATTHEW GERSHKOFF and his coconspirators.

18. Between on or about January 8, 2014 through on or about October 2, 2018, MATTHEW GERSHKOFF and his coconspirators obtained in excess of \$400,000 from Corporation #1, through the scheme to defraud.

All in violation of Title 18, United States Code, Section 1349.

THE UNITED STATES ATTORNEY FURTHER CHARGES:

COUNT 2
Aggravated Identify Theft
18 U.S.C. § 1028A

On or about September 25, 2018, in the Middle District of
Pennsylvania, and elsewhere, the defendant,


MATTHEW GERSHKOFF,

aiding and abetting others, knowingly transferred, possessed, and used,
without lawful authority, a means of identification of another person
during and in relation to a felony violation enumerated in Title 18,
United States Code, Section 1028A(c), namely wire fraud conspiracy, in
violation of Title 18, United States Code, Section 1349, knowing that
the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 2 and
1028A(a)(1).

DAVID J. FREED
United States Attorney

Date: 3/6/20

By: 
PHILLIP J. CARABALLO
Assistant United States Attorney